Applicants' invention relates to a method of making a laminated trim panel. Contrary to the Examiner's assertion, the Sanchez et al. reference teaches not a method of making a laminate, but the deformation of a fabric laminate. Specifically, the Sanchez et al. reference discloses a method of eliminating curl and fabric distortion after molding fibrous fabrics which are backcoated (column 1, lines 6 through 9). Unfortunately, the text of the Sanchez et al. reference is confusing and some terms are used inconsistently. When viewed after the definitions of terms used therein are understood however, it is clear that the Sanchez et al. reference does not teach or suggest the invention as recited in Applicants' independent Claims 1, 13, and 20.

The Sanchez et al. reference states that the invention relates to "fibrous fabrics which are backcoated," (column 1, lines 6 through 9) and identifies carpet and "fabric laminates" (column 1, line 9) as examples. The Sanchez et al. reference variously refers to such fabric laminates as "fibrous fabrics which are backcoated," (column 1, lines 6 through 9) "fabrics ...provided with a moldable backing," (column 1, lines 26 through 27) "backcoated fabric," (column 1, line 39) and "the fabric" (column 2, line 5). Accordingly, the Sanchez et al. reference intended such terms to be used synonymously, such that "fabric laminate" is synonymous with "backcoated fabric," and with "fabric."

Further, column 2, lines 31 through 41, specifically defines "fabric" as "comprising a face fabric and backing layer," i.e., a fabric laminate, as noted above. Thereafter, and throughout the written description of the invention, the term "fabric" is used in the context of a combination of a face fabric and a backing layer. When viewed in such a context, it is clear that the all references to "fabric" refer to a fabric laminate, and that the fabric portion of the laminate is referred to as a "face fabric."

As stated in the Description of the Preferred Embodiments of the Sanchez et al. reference, the invention is directed to modifications in the molding hardware to minimize distortion. The molding process described in the Sanchez et al. reference begins with a fabric laminate, i.e., fabric having a moldable backing already coated to the face fabric. The specific examples disclosed beginning at column 10, line 54 also each begin with a *fabric* having a polyethylene backing already applied. The

08/01/05 09:26 FAX 🖾 003

remaining description discloses heating the fabric laminate so that the fabric laminate can be formed in a compression mold. A thorough reading of the Sanchez et al. reference makes it clear therefore, that the reference does not teach or suggest the invention as recited in Applicants' independent Claims 1, 13, and 20.

The cited reference does not describe the present invention, nor would a person of ordinary skill in the art find it obvious to modify the cited reference as suggested by the Examiner. Accordingly, the invention as defined in the Claims is clearly patentable over the cited reference. In view of the above remarks, the applicant respectfully requests that the rejections be withdrawn.

Respectfully submitted,

Gregory W. Robinette

Reg. No. 56,117

MacMillan, Sobanski & Todd, LLC One Maritime Plaza, Fourth Floor 720 Water Street Toledo, Ohio 43604 (419) 255-5900